

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, *ex rel.*

ANTONI MUHAWI,

Plaintiff,

v.

Case No.: 18-CV-02022
Hon. Manish S. Shah

PANGEA EQUITY PARTNERS,
PANGEA EQUITY PARTNERS, LP,
PANGEA EQUITY PARTNERS II, LP,
PANGEA PROPERTIES,
PANGEA VENTURES, LLC,
PANGEA REAL ESTATE, and
PANGEA REAL ESTATE HOLDINGS, LLC,

Defendants.

JOINT STATUS REPORT

Pursuant to this Court’s October 27, 2023 Minute entry (Dkt. 110), counsel for Antoni Muhawi (“Relator”) and counsel for Pangea Equity Partners, Pangea Equity Partners, LP, Pangea Equity Partners II, LP, Pangea Properties, Pangea Ventures, LLC, Pangea Real Estate, and Pangea Real Estate Holdings, LLC (together, “Defendants”) (collectively, the “Parties”) submit this joint status report with an update on discovery progress.

The Parties have worked cooperatively over the last several months and have served initial disclosures, written discovery, written responses, and entered into a protocol for the exchange of

electronically stored information following several meet-and-confer discussions. Relator provided written correspondence to Defendants regarding certain objections to Relator's discovery demands, and Defendants have responded. The Parties recently met and conferred regarding some of the issues raised by Relator, and it appears motion practice may be necessary on certain issues.

Regarding document production, Relator produced approximately 8,600 documents to Defendants on February 9, 2024, which is likely the bulk of what Relator will produce in this matter. Some supplementation by Relator over the course of the next several weeks is expected.

Defendants are readying approximately 24,000 documents for production this week. Sizeable rolling productions will follow. Given the lengthy time period at issue (since 2012) and the number of housing units potentially at issue, the total number of documents that Defendants will ultimately produce will reach well into six figures, if not higher. Production is also complicated because older responsive documents are stored on legacy systems and because of turnover of Defendants' personnel over the years.

The Parties recently met and conferred regarding the current fact discovery deadline of May 31, 2024 (Dkt. 110). The Parties agree that an extension is necessary to allow sufficient time for a large production of documents, party and nonparty depositions, and anticipated motion practice. The Parties are also discussing a mediation that they anticipate will take place within the next 60 days. For these reasons, the Parties request that the fact discovery deadline be extended until October 31, 2024. If mediation is unsuccessful, the Parties anticipate and agree that document production will be substantially complete by June 30, 2024.

Dated: March 12, 2024

HODGSON RUSS LLP

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